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6 Attorneys for Defendant
7 KWOK CHEUNG CHOW

8 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10 No. CR 14-0196 CRB

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KWOK CHEUNG CHOW,

15 Defendant.

SUPPLEMENTAL EXHIBIT IN
SUPPORT OF MOTION FOR
RECONSIDERATION OF PROTECTIVE
ORDER AND DENIAL OF DEFENSE
REQUEST FOR RECIPROCAL
PROTECTIVE ORDER

Date: August 20, 2014
Time: 2:00 p.m.
Hon. Judge Breyer

16 _____/
17 COMES NOW DEFENDANT KWOK CHEUNG CHOW, through counsel, and
18 hereby files the attached Supplemental Exhibit In Support of the
19 Motion for Reconsideration of the Protective Order, filed on
20 July 24, 2014, as Docket item 369. Counsel asks this Court to
21 take note of the following defense motion to Vacate Protective
22 Order and the court's Order (Docket Item 272) in United States
23 v. Cruz (11-CR-00355-DLJ), a case in this district. The Order
24 was entered on July 24, 2014.

25 The attached exhibit illustrates the fact that the
26 Government has developed a practice of exaggerating the size of
27 data and feasibility of redaction in order to obtain protective
28 orders which unfairly constrain defense and preparation for

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1 trial.

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DATED: July 25, 2014

Respectfully Submitted,

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/s/CURTIS L. BRIGGS

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J. TONY SERRA

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GREGORY M. BENTLEY

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Attorneys for Defendant

KWOK CHEUNG CHOW

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